

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JOSEFINA DOE; ISABELA DOE;
COMMOR JEROME WELCH;
FELIPE NIOMAR MARTINEZ
ORTIZ; and JOSE DOE;
on behalf of themselves and all others
similarly situated, and
THE AMERICAN FRIENDS
SERVICE COMMITTEE,
IMMIGRANT RIGHTS PROGRAM,

Plaintiffs,

v.

U.S. DEPARTMENT OF
HOMELAND SECURITY;
U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT;

ALEJANDRO MAYORKAS,
Secretary of the Department of
Homeland Security, in his official
capacity;

PATRICK J. LECHLEITNER, Acting
Director of Immigration and Customs
Enforcement (“ICE”), in his official
capacity;

DANIEL A. BIBLE, Executive
Associate Director of ICE’s
Enforcement and Removal Operations,
in his official capacity;

CAMMILLA WAMSLEY, Field
Office Director for the ICE

Civil Action No. 2:24-cv-9105

**PLAINTIFFS JOSEFINA DOE,
ISABELA DOE, AND JOSE
DOE’S NOTICE OF MOTION TO
PROCEED UNDER
PSEUDONYMS**

ORAL ARGUMENT REQUESTED

Philadelphia Field Office, in her official capacity;

FRANCIS KEMP, Assistant Field Office Director for the ICE Philadelphia Field Office, in his official capacity,

Defendants.

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on October 7, 2024, or as soon as counsel may be heard, the undersigned attorneys for Plaintiffs Josefina Doe, Isabela Doe, and Jose Doe (collectively, the “Doe Plaintiffs”), shall move before an Honorable Judge of the United States District Court for the District of New Jersey, Newark Vicinage, for an Order permitting the Doe Plaintiffs to proceed under pseudonyms.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Plaintiffs rely upon the accompanying (1) Memorandum of Law; (2) Declaration of Josefina Doe; (3) Declaration of Isabela Doe; and (4) Declaration of Jose Doe.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith pursuant to Local Civil Rule 7.1(e).

Dated: September 11, 2024

By: /s/ Gavin J. Rooney
Gavin J. Rooney, Esq.
Alexander Shalom, Esq.
Natalie J. Kraner, Esq.
Naomi D. Barrowclough, Esq.
Anish Patel, Esq. (*pro hac vice*
motion forthcoming)

Ruth Zimmerman, Esq.
LOWENSTEIN SANDLER LLP
One Lowenstein Drive
Roseland, New Jersey 07068
973-597-2500

Shira Wisotsky, Esq.
Raquiba Huq, Esq.
Zoe Burke, Esq.
Emily Thornton, Esq. (*pro hac vice*
motion forthcoming)
**LEGAL SERVICES OF NEW
JERSEY**
908-882-2665
P.O. Box 1357
Edison, NJ 08818-1357

Tiffany Lieu, Esq. (*pro hac vice*
motion forthcoming)
Philip L. Torrey, Esq. (*pro hac vice*
motion forthcoming)
CRIMMIGRATION CLINIC
HARVARD LAW SCHOOL
IMMIGRATION &
REFUGEE CLINICAL
PROGRAM
6 Everett St. Suite 3106
Cambridge, MA 02138
617-496-5497

Pro Bono Counsel for Plaintiffs